# Case 21-00085 Doc 27 Filed 03/25/21 Entered 03/25/21 12:07:59 Desc Main UNITED STATISTICS BANKEY PTGY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

RE:	DEMETRIA LITTLE	)	Case No. 21 B 00085
		)	
		)	Chapter 13
	Debtor(s)	)	
		)	Judge: JACK B SCHMETTERER

## NOTICE OF MOTION & CERTIFICATE OF SERVICE

DEMETRIA LITTLE 8120 S EMERALD CHICAGO, IL 60620 DAVID M SIEGEL via Clerk's ECF noticing procedures

Please take notice that on April 21, 2021 at 11:00 am., I will appear before the Honorable Judge JACK B SCHMETTERER or any judge sitting in the judge's place and present the motion set forth below.

#### This motion will be presented and heard electronically using AT&T Teleconference.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must call this toll-free number: <u>1-877-336-1839</u>. Then enter access code <u>3900709</u> followed by the pound (#) sign.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on March 25, 2021.

/s/ M.O. Marshall

M.O. Marshall, Trustee

Chapter 13 Trustee 55 East Monroe, Suite 3850 Chicago, IL 60603 (312) 294-5900

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## MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes M.O. Marshall, Trustee, and requests that this case be dismissed pursuant to 11 U.S.C. §1307(c)(1), and in support thereof respectfully states the following:

- On January 06, 2021 the debtor(s) filed a petition and plan under Chapter 13 of Title
  U.S.C.
- 2. A plan has not been confirmed in this case.
- 3. The debtor(s) has caused unreasonable delay that is prejudicial to creditors by failing to:

Provide '16 '17 and '18 tax returns and amend Plan to insert tax return language and increase adequate protection payment to Chrysler Capital to at least \$156.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

/s/ M.O. Marshall

M.O. Marshall, Trustee

Chapter 13 Trustee 55 East Monroe, Suite 3850 Chicago, IL 60603 (312) 294-5900